

future alphas for the same pixel to generate a filtered alpha." Gloudemans, col. 32, lns. 45-47. That is, in the flicker filter operation of Gloudemans, a filtered alpha is calculated from other alphas for the same pixel. This is not the same as "adjusting a flicker filter based upon the alpha value" as recited by claim 1. Thus claim 1 patentably distinguishes over Gloudemans. For the same reason, dependent claims 2-9 are also patentable over Gloudemans. Further, independent claims 10 and 17 and the claims depending therefrom are also patentable for the same reason.

As to dependent claims 2 and 18, nowhere does Gloudemans disclose "comparing the alpha value to a predetermined value to arrive at a result." Instead, the "threshold determination step (484)" of Gloudemans referred to by the Office Action relates to an image matching step and not comparison of an alpha value to a threshold. Gloudemans, col. 16, lines 31-40; FIG. 12. Further, the "threshold comparison (506)" referred to by the Office Action relates to a delay threshold, not comparison of an alpha value to a threshold. Gloudemans, col. 20, lines 10 to 40; FIG. 15. Thus claims 2 and 18 patentably distinguish over Gloudemans for this further reason.

Regarding claims 3-4 and 19-20, nowhere does Gloudemans disclose subtracting an alpha value from a threshold value to arrive at a second result as recited by claims 3 and 19. The determination of alphas for each of the edge points referred to by the Office Action does not anticipate these claims. Nor does the "sequence of operations for determining an alpha for an edge point" referred to by the Office Action anticipate "dividing the second result by an alpha step value to arrive at a third result; and adjusting the filter level based on the third result" as recited by claims 4 and 20. For these further

reasons, claims 3-4 and 19-20 patentably distinguish over Gloudemans.

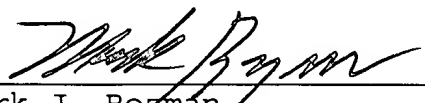
Claims 5, 7, 8, 15, and 21 further patentably distinguish because nowhere does Gloudemans disclose turning off a flicker filter when a predetermined threshold value exceeds the alpha value, or otherwise. Nor does Gloudemans disclose adjusting a filter level, either when an alpha value exceeds a threshold or in response to a result. Thus claims 6, 9, and 22 patentably distinguish for this further reason.

Regarding claims 12 and 16, Gloudemans does not disclose adjusting a level of a flicker filter based on a result of a comparison of an alpha value to a threshold value. Thus for this further reason, claims 12 and 16 are patentable over Gloudemans.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

Date: July 24, 2002

  
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